

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

W.R. GRACE & CO., *et al.*,

Debtors.

Chapter 11

Case No. 01-01139 (JKF)
Jointly Administered

Ref. Nos. 19581, 19620 & 20204

**LIBBY CLAIMANTS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
BY DEBTORS IN CONJUNCTION WITH PLAN CONFIRMATION**

PLEASE TAKE NOTICE THAT, pursuant the Federal Rules of Bankruptcy Procedure 7034 and 9014 and Federal Rule of Civil Procedure 34, the Libby Claimants hereby request that the Debtors produce for inspection and copying the documents described herein which are in its possession, custody or control, and deliver an electronic copy thereof to the offices of Cohn Whitesell & Goldberg LLP, 101 Arch Street, Boston, Massachusetts, 02110, on or before December 26, 2008.

DEFINITIONS

The following terms used in this request for production of documents have the following meanings:

A. The "Libby Claimants" shall mean the claimants injured by exposure to asbestos from the Debtors' operations in Lincoln County, Montana (the "Libby Claimants").¹

B. "Debtors" shall mean W.R. Grace & Co., Inc and all of its predecessors, divisions, subsidiaries, and affiliated companies, whether wholly or partially owned, their present or former directors, officers, employees, agents, affiliates and attorneys of any of the foregoing,

¹ As identified in the Amended and Restated Verified Statement of Cohn Whitesell & Goldberg LLP and Landis Rath & Cobb LLP Pursuant to Fed. R. Bankr. P. 2019 [D.I. 19927], as it may be amended and restated from time to time.

and any other Person (as defined below) over whom or which any of the foregoing may exercise control.

C. “Rust” shall mean Rust Consulting, Inc., the Debtors’ claims processing agent in these Chapter 11 cases.

D. A “document” shall be synonymous in meaning and equal in scope to the usage of this term in Rule 34(a) of the Federal Rules of Civil Procedure. A draft or non-identical copy is deemed a separate document within the meaning of this term. The term document includes all information stored electronically on a computer or similar machine, or diskette, floppy disk or other medium.

E. “Identify,” as it refers to a natural person, shall mean to state a person’s full name, present or last-known address, and present or last-known place of employment; “identify,” as it refers to a document, shall mean to state the type, general subject matter, date, author(s), addressee(s), and recipient(s) of the document.

F. “Person,” shall mean any natural person or any business, legal, or governmental entity or association.

INSTRUCTIONS

G. When necessary to give a broader usage to any item of this request, “and” includes “or” and vice versa, the past tense includes the present and vice versa, the singular includes the plural and vice versa, and “any” includes “all” and vice versa.

H. Specify which documents are produced in response to each numbered request and from whose files each document is being produced.

I. If any document responsive to this request was in your possession or control but has been disposed of, lost, discarded, destroyed, or is otherwise currently unavailable: state its

author, preparer or originator, addressee(s), recipient(s), date, subject matter, and all persons to whom copies were directed, furnished or addressed; describe the contents of the document; state when the document was within Grace's control or possession; state the last known location(s) of each such document and any additional copies thereof; and state the date or approximate time of the disposition, loss, destruction or discarding of each such document, the reason therefor, and the person or persons responsible therefor.

J. If the attorney-client, work product or any other privilege is claimed as to any document requested herein, state in writing, on or before the date of production: the nature (e.g., letter, memorandum, tape, etc.), date, subject matter and author, preparer or originator of each such document; the names of all persons to or by whom such document was furnished, directed, addressed or received; and the basis for each such claim of privilege.

K. If any document herein requested cannot be produced in full, produce the document to the extent possible, identifying any portion of the document which can not be so produced and specifying the reasons for the inability to produce the remainder of the document.

L. This request is a continuing one. If, after producing the requested documents, you obtain or become aware of any further documents responsive to this request, you are required to produce such additional documents to the Libby Claimants.

REQUESTS FOR PRODUCTION OF DOCUMENTS

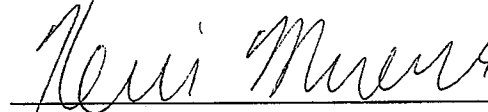
1. All images of the Personal Injury Questionnaires ("PIQ") submitted by asbestos personal injury claimants in these Chapter 11 cases.

2. All images of the asbestos personal injury proofs of claim ("POC") filed in these Chapter 11 cases.

3. The Rust database in which are recorded the objective data contained on the PIQ's and the POC's.

Dated: December 19, 2008
Wilmington, Delaware

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